Message

From: Cathy Laughner [cathyl@bkbh.com]

Sent: 3/30/2021 5:21:02 PM

To: Hanson, Robyn [Hanson.Robyn@epa.gov]
CC: Thomas Jodoin [TJODOIN@helenamt.gov]

Subject: Helena Local Limits

Attachments: City of Helena EPA Region 8 Local Limits Development.final to EPA.xls; Data Analysis.2020 2021 DomCom to EPA.xlsx;

2019 Local Limits Re-evaluation.pdf

Robyn,

Please see attached Local Limits recently developed for Helena. I have also attached the technical evaluation for these in the event you have not seen it. Please correct me if I am wrong, but I understand from the regulations that the City is to "public notice" the local limits according to 40 CFR 403.5(c)(3) before officially sending them to EPA for approval. Unless I hear from you otherwise this week, the City will proceed with the 40 CFR 403.5(c)(3) notice.

If the modification is "substantial," then only after EPA's approval are the local limits effective, according to 40 CFR 403.18(c)(2).

Cathy Laughner